MS. SUPKO: Good morning. My name is Eileen Supko. I'm with Energy Resources International. We're an energy consulting firm. I'm a nuclear engineer and a senior consultant with ERI in Washington, D.C. I provide consulting services to utilities, nuclear energy organizations and other groups for nuclear waste transportation, storage, and disposal. And I've been following the DOE program for the past ten years.

1 I'd like to commend DOE for its thorough, comprehensive evaluation of one of the most challenging aspects of the proposed action, and that's the used nuclear fuel transportation to Yucca Mountain. I encourage DOE not to include the more significant evaluation of transportation routes as part of the environmental impact statement process, as to do so would be to go beyond the scope of the National Environmental Policy Act, which is to provide input to a decision and venture into route planning, which would be implementing a decision.

The purposes of the NEPA analysis are to assess and bound potential environmental impacts and human health effects of the proposed action. The DOE EIS has done this. If, during the transportation planning process that would take place following the decision by policy makers to proceed or not proceed with the proposed action, DOE then identifies transportation routes in areas that may not be bound up by this evaluation, then they would do a supplemental analysis at that time.

DOE has been criticized by some for not identifying the national highway and rail shipping routes within the EIS, and as was mentioned by a comment earlier, it's evident that they indeed did do a point of origin to point of destination analysis for transportation from reactor sites and DOE waste sites to the proposed Yucca Mountain site. However, the summary level detail on transportation routing as provided in the Draft Environmental Impact Statement in my opinion is appropriate for a NEPA document.

DOE's approach to providing route analysis is consistent with transportation route analysis that has been performed in other DOE draft environmental impact statements and final environmental impact statements associated with the transportation of spent nuclear fuel, such as the Programmatic, Spent Fuel Management and Idaho National Engineering Laboratory Environmental Restoration and Waste Management -- a long title -- final environmental impact statement that was issued in 1995.

2 DOE could improve its transportation analysis by including a strong statement in the final environmental impact statement regarding the inherent safety of used fuel transportation and robust packages used to transport nuclear fuel and high-level radioactive waste. DOE should also put the risks associated with spent fuel transportation in perspective such that it's evident to members of the public and policy makers and clearly identifies that transportation risks associated with the proposed action are small.

1 (cont'd.) In summary, I believe the transportation analysis is thorough, it's enveloping, and provides an excellent basis for moving forward with the transportation planning following positive recommendation of the proposed action. Thank you.